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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11
:
Gawker Media LLC, *et al.*,¹ : Case No. 16-11700 (SMB)
:
Debtors. : (Jointly Administered)
:
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**NOTICE OF FILING OF REVISED VERSION OF DEBTORS'
AMENDED JOINT CHAPTER 11 PLAN OF LIQUIDATION FOR GAWKER
MEDIA GROUP, INC., GAWKER MEDIA LLC, AND GAWKER HUNGARY KFT.
AND PROPOSED FORM OF ORDER APPROVING SUCH JOINT CHAPTER 11 PLAN**

PLEASE TAKE NOTICE that on September 30, 2016, the Debtors filed the *Disclosure Statement for the Debtors' Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft.* [Docket No. 308] (the "Disclosure Statement"), which included as Exhibit A thereto the *Debtors' Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft.* (the "Original Plan").

¹ The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). Gawker Media LLC and Gawker Media Group, Inc.'s mailing addresses are c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10022. Gawker Hungary Kft.'s mailing address is c/o Opportune LLP, Attn: William D. Holden, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

PLEASE TAKE FURTHER NOTICE that on November 2, 2016, the Debtors filed the *Disclosure Statement for the Debtors' Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft.* [Docket No. 403] (as it may be modified, amended, or supplemented, the "Amended Disclosure Statement"), which included as Exhibit A thereto the *Debtors' Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft.* (the "Amended Plan").

PLEASE TAKE FURTHER NOTICE that on November 4, 2016, the Court entered the *Order Approving (I) the Adequacy of the Disclosure Statement, (II) the Solicitation and Notice Procedures with Respect to Confirmation of the Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft., (III) the Form of Ballots and Notices in Connection Therewith, and (IV) the Scheduling of Certain Dates with Respect Thereto* [Docket No. 413].

PLEASE TAKE FURTHER NOTICE that on November 8, 2016, the Debtors filed the *Notice of Filing of Solicitation Version of the Disclosure Statement for the Debtors' Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft.* (the "Solicitation Version of the Amended Disclosure Statement"), which included as Exhibit A thereto the *Amended Debtors' Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft.* (the "Solicitation Version of the Amended Plan").

PLEASE TAKE FURTHER NOTICE that a hearing to consider confirmation of the Plan is scheduled for **December 13, 2016 at 10:00 a.m. (prevailing Eastern Time)** before the Honorable Stuart M. Bernstein at the United States Bankruptcy Court for the Southern District of

New York, One Bowling Green, Courtroom 723, New York, New York 10004 (the “Confirmation Hearing”).

PLEASE TAKE FURTHER NOTICE that, in response to comments received and objections raised, the Debtors hereby file a revised version of the Amended Plan (the “Plan”) attached hereto as **Exhibit A**.

PLEASE TAKE FURTHER NOTICE that a redline reflecting the changes from the Solicitation Version of the Amended Plan filed on November 8, 2016 is attached hereto as **Exhibit B**.

PLEASE TAKE FURTHER NOTICE that a proposed form of order confirming the Plan is attached hereto as **Exhibit C**.

[Remainder of page intentional left blank.]

PLEASE TAKE FURTHER NOTICE that the Confirmation Hearing may be continued from time to time by the Court or the Debtors without further notice other than by such adjournment being announced in open court or by a notice of adjournment being filed with the Court and served on parties entitled to notice under Bankruptcy Rule 2002 and the local rules of the Court or otherwise.

Dated: December 11, 2016
New York, New York

/s/ Gregg M. Galardi
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